



Marjorie L. Hauf, Esq.
Nevada Bar No.: 8111
Matthew G. Pfau, Esq.
Nevada Bar No.: 11439
Bre'Ahn Brooks, Esq.
Nevada Bar No.: 15672
H&P LAW
710 S 9th Street
Las Vegas, NV 89101
702 598 4529 TEL
702 598 3626 FAX
mhauf@courtroomproven.com
mpfau@courtroomproven.com
bbrooks@courtroomproven.com
Attorneys for Plaintiff,
Maria Shaw

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

Maria Shaw,

Case No.: 2:24-cv-00132-RFB-DJA

Plaintiff,

vs.

**The Vons Companies Inc. a foreign
corporation, dba Vons, Safeway, Inc.,
a foreign corporation, DOES I through
X; and ROE CORPORATIONS I through X,
inclusive,**

Defendants.

**Stipulation and Order to Extend
Discovery (Second Request)**

Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-3, the parties, by and through their respective counsel of record, stipulate and agree that there is good cause to extend the discovery deadlines in the operative discovery plan [ECF No.16], as set forth below.

A. Pursuant to LR ²⁶⁻³~~26-4~~(a), the parties stipulate that the following discovery was completed:

1. The parties have served initial disclosures pursuant to FRCP 26(a)(1);



2. Plaintiff has propounded written discovery on Defendants;
3. Defendants have propounded written discovery on Plaintiff;
4. Plaintiff has answered written discovery requests;
5. Defendants' have answered written discovery requests;
6. Deposition of Plaintiff.

26-3

B. Pursuant to LR ~~26-4~~(b), the parties stipulate that they need to complete the following discovery:

1. Deposition of Defendants;
2. Deposition of percipient witnesses;
3. Initial and Rebuttal Expert Disclosures;
4. Deposition of Defendants' FRCP 30(b)(6) witnesses and/or employees;
5. Depositions of Plaintiff's medical providers;
6. Depositions of each party's respective experts;
7. Additional Written Discovery; and
8. Any other discovery that may become necessary upon completion of the discovery above.

26-3

C. Pursuant to LR ~~26-4~~(c), the parties stipulate an extension is needed for the following reasons:

The parties have been diligent in conducting discovery thus far. Notwithstanding this fact, there have been several impediments to completing the necessary discovery within the current discovery period.

Defendant filed a Motion for Protective Order seeking protection regarding several of Plaintiff's written discovery requests. That motion has not been decided by the Court. Plaintiff requires this discovery prior to the deposition of FRCP 30(b)(6) witnesses for Defendant and in advance of the parties initial expert disclosure deadline.



1 Based on the outstanding discovery still needed and the pending motions before
2 the Court, there is good cause to extend the discovery deadlines ninety (90) days.

3
4 **D. Pursuant to LR ²⁶⁻³~~26-4~~(d), the parties stipulate to the following proposed**
5 **schedule for completing all remaining discovery:**

6 The parties agree to extend all the discovery deadlines in this case by ninety (90)
7 days, as set forth below:

- 8
- 9 1. Extend the discovery cut-off deadline from 10/28/24 to 1/27/25;
- 10 2. Extend the deadline to amend the pleadings and add parties from 8/30/24 to
- 11 11/29/24;
- 12 3. Extend the date for initial expert disclosures from 8/30/24 to 11/29/24;
- 13 4. Extend the date to disclose rebuttal expert witnesses from 9/30/24 to
- 14 12/30/24;
- 15 5. Extend the date to file dispositive motions from 11/29/24 to 2/27/25; and
- 16 6. Extend the date to file the Joint Pre-Trial Order from 12/30/24 to 3/31/25. If
- 17 dispositive motions are filed, the joint pretrial order is due thirty (30) days from
- 18 the entry of the court's ruling on the motions.
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28



1 7. Fed. R. Civ. P. 26(a)(3) Disclosures must be included in the Joint Pre-Trial Order.

2
3 DATED this 16th day of May, 2024

DATED this 16th day of May, 2024

4 H&P LAW

BACKUS | BURDEN

5 */s/ Marjorie Hauf*

/s/ Jacquelyn Franco

6
7 Marjorie L. Hauf, Esq.
8 Nevada Bar No.: 8111
9 Matthew G. Pfau, Esq.
10 Nevada Bar No.: 11439
11 Bre'Ahn Brooks, Esq.
12 Nevada Bar No.: 15672
13 710 S. 9th Street
14 Las Vegas, NV 89101
15 *Attorneys for Plaintiff*

Jack P. Burden, Esq.
Nevada Bar No.: 6918
Jacquelyn Franco, Esq.
Nevada Bar No.: 13484
3050 South Durango Drive
Las Vegas, NV 89117
Attorneys for Defendants
The Vons Companies, Inc and Safeway, Inc.

16
17 **IT IS SO ORDERED.**

18 DATED: 5/17/2024

19
20 

21 DANIEL J. ALBREGTS
22 UNITED STATES MAGISTRATE JUDGE
23
24
25
26
27
28